

REMARKS/ARGUMENTS

I. THE PENDING CLAIMS

Claims 1-9 and 11-30 are currently pending in the application. Claims 1, 16 and 25 are independent claims. All currently pending claims have been rejected.

II. REJECTION OF CLAIMS 1-5, 7-9, 11-23, 25-27 AND 29-30

Claims 1-5, 7-9, 11-23, 25-27 and 29-30 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application No. 2003/0120571 (hereafter "Blagg"). The Examiner states that all of the elements of Claim 1 are met by various cited paragraphs in Blagg. However, the Applicants respectfully disagree and submit that none of the elements of Claim 1 are disclosed by Blagg.

A. Burden Of Proof

For a prior art reference to anticipate an invention, "the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present." MPEP § 706.02.

B. General Summary Of The Cited Reference, Blagg

Blagg discloses a method for linking accounts corresponding to different products together to create a group so that group processing can be performed at the group level while independent processing of the accounts is performed at the account level. (Abstract). The disclosed method "links the accounts into a group by linking a financial record for each account to group master data for the group." (Abstract). "The group typically includes a key account and one or more dependent accounts." (Abstract). A dependent strategy for a dependent account specifies the authorization option for the

dependent account. (§ 35). The authorization option specifies the information that is used to authorize a transaction. (*Id.*). Payment for a dependent account is credited depending on who pays an invoice. (§ 144). If a dependent account cardholder, such as a son or daughter, pay the invoice, the dependent card holder account is credited. (*Id.*). If the dependent account is paid by the **primary owner**, then the amount of the payment is credited to the dependent account depends upon the control settings for the group and the amount of the payment. (§§ 144-145) (emphasis added).

C. Claims 1-5, 7-9, And 11-15 Are Not Anticipated By Blagg

Claim 1 is an independent claim. Claims 2-15 depend directly or indirectly from claim 1. Currently amended claim 1 requires that a system for the payment of petty cash disbursements comprises one or more master purchasing card accounts linked to a bank account and one or more subordinate purchasing card accounts linked to one of the master purchasing card accounts or to other subordinate purchasing card accounts linked, directly or indirectly, to one of the master purchasing card accounts. Claim 1 also requires that the owner of the bank account be authorized to transfer funds to any master purchasing card account to cover purchases made using that master purchasing card account or any subordinate purchasing card account linked to that master purchasing card account. Claim 1 further requires that the owner of any of the purchasing card accounts be authorized to move funds from its own account to any subordinate purchasing card account having a link thereto.

1. Claim 1 Is Not Anticipated By Blagg

Blagg does not contain a disclosure of numerous limitations of currently amended claim 1. The limitations Blagg does not disclose are discussed below.

a. one or more master purchasing card accounts linked to a bank account

The Examiner states that this element is disclosed in Blagg at paragraphs [0055]-[0056], [0069] and [0072] (regarding linking accounts) and in Blagg at paragraph [0062] (indicating that the issuer is typically a financial institution or bank). These paragraphs however, and in particular [0055]-[0056], [0069] and [0072], teach the grouping of cards together into groups by virtue of the creation of a “group” entity having the cards as members. The “group” entity is not a bank account, it is merely a data record that contains a listing of the members of the group (*See* Blagg, paragraph [0072]). Blagg does not disclose the linking of master purchasing card accounts to a specific bank account. In Blagg, there is no master bank account to which all of the master purchasing accounts are linked. Although each individual card in both Blagg and the present invention has their own accounts, there is no mention of the cards in Blagg being linked to a bank account different from the account present for each individual card. Instead, the cards in Blagg are formed together into a group of cards.

With respect to the issuer typically being a financial institution or bank as indicated in Blagg, paragraph [0062], the Applicants respectfully submit that it is not relevant because the issuer of each individual card being a financial institution or bank is not part of the Applicants' claim. It is common knowledge that issuers of credit cards are typically financial institutions or banks. However, no financial institution or bank currently allows the linking of an individual credit card account to a bank account. For these reasons, the Applicants respectfully submit that this element of Claim 1 and its dependent claims has not been met.

- b. *one or more subordinate purchasing card accounts linked to one of said master purchasing card accounts or to other subordinate purchasing card accounts linked, directly or indirectly, to one of said master purchasing card accounts*

The Examiner states that this is disclosed in Blagg at paragraphs [0071]-[0075] and [0090]-[0094]. However, the Applicants respectfully submit that these paragraphs do not disclose linking accounts to each other but instead disclose linking accounts into a group. The grouping of accounts in Blagg is accomplished by linking a financial record that corresponds to each account to group master data record for the group. Therefore, cards are not linked to individual other cards or to a bank account, but are instead linked together in a group by virtue of the tying of their financial record to a group master data record (See Blagg, paragraph [0072], lines 1-3 & Figure 4B). Thus, the topography of the Blagg invention is different than that of the present application.

The Blagg topography is shown graphically in Figure 4B of Blagg, in which the Dependent Financial Records 404, 406, 408, 410, 412, 414 and 416 are linked to a “Group Master Data” 400 (not an account). Blagg does teach a Key Financial Record 402, which is the account that is liable for the group (See Blagg, Paragraph [0079]). Note, however, that Key Financial Record 402 is not directly linked to any of the Dependent Financial Records, nor are any of the Dependent Financial Records linked to any other Dependent Financial Records, as is claimed in the present application. Therefore, there is no parent/child relationship between the accounts.

The present invention, on the other hand, requires the linking of a card account to other accounts, which may be master accounts (i.e., account which are linked directly to the master bank account) or which may be other accounts which are subordinate to a

master account. This is not disclosed by Blagg, and for this reason, the Applicants respectfully submit that this element is also not taught by the cited reference.

- c. *wherein an owner of said bank account has the authority to authorize the transfer of funds to any master purchasing card account to cover purchases made using that master purchasing card account or any subordinate purchasing card account linked to that master purchasing card account*

The Examiner states that this element is disclosed in Blagg at paragraphs [0075]-[0078], [0104] and [0126]. Paragraphs [0075]-[0078] discuss liability for purchases made by various cardholders in the group (i.e., one cardholder can be individually or jointly liable for purchases made on another card). Paragraphs [0075]-[0078] do not disclose the transferring of funds between cards or between a bank account and cards which are linked to that bank account. Further, paragraph [0104] discusses combining accounts, which the Applicants respectfully submit is not relevant because that feature is not part of the claim. In paragraph [0126], the cited reference discusses changing the primary owner of a group which also has no relevance here because the claim does not contain an element specifying changing the owner of the group. As a result, The Applicants respectfully submit that the transferring of funds between cards is not disclosed by the cited portions of Blagg.

- d. *wherein an owner of any of said master purchasing card accounts has the authority to authorize the movement of funds from its own account to any subordinate purchasing card account having a link thereto*

The Examiner states that this is disclosed in Blagg at paragraphs [0134]-[0142], which discuss authorizing transactions, and in paragraphs [0143]-[0154] which discusses the application of payments. Paragraphs [0134]-[0142] disclose authorizing a transaction (i.e., authorizing the payment of a merchant at the time a purchase is made by a

cardholder.) However, this is not what is being claimed in this element. This element of the claim states that owners of purchasing card accounts can authorize the transfer of funds from its own account to subordinate accounts which are linked thereto. This has nothing to do with authorizing payment of the merchant at the time of the purchase by individual cardholders, but instead authorizes the transfer of funds to the purchasing account to cover purchases which have already been made.

Likewise, paragraphs [0143]-[0154] discuss the applying of a payment which is received from a cardholder, and, in particular, how a payment received from one cardholder in a group can be applied across the group in a variety of different ways. However, in the present application, and in particular, as specified by this element and the previous element, funds to cover purchases made by any card originate at the bank account and flow down from the bank account to master purchasing cards, and then to subordinate purchasing cards, etc. Nothing in this claim discusses how a payment received from a cardholder is applied to that individual cardholder's account by a credit card issuer or to any cardholder's account within the hierarchy. As a result, the Applicant respectfully submits that this element is also not disclosed by Blagg.

As a result of the discussion above, the Applicants respectfully submit that none of the elements of Claim 1 are disclosed by Blagg.

2. Claim 2 Is Not Anticipated By Blagg

With respect to Claim 2, which is dependent upon Claim 1, Claim 2 contains all of the limitations of Claim 1 and therefore the remarks with respect to Claim 1 apply to Claim 2 as well.

3. Claim 3 Is Not Anticipated By Blagg

With respect to Claim 3, which contains all of the elements of Claim 1, and, in addition, includes the element that the purchasing cards may create and break links to or from subordinate purchasing cards, the Examiner states that this element is disclosed in Blagg at paragraphs [0080] and [0085]. However, paragraph [0080] merely discusses that a record is maintained in a group member file even if an account is de-linked from the group. Paragraph [0080] does not specify how cards become linked or de-linked from the group and in particular does not state that the purchasing cardholders may create and break links to or from subordinate purchasing accounts. Likewise, paragraph [0085] discloses how a payment made to the group is to be applied across its various card members, and has no relevance with respect to the linking and de-linking of cards.

4. Claim 4 Is Not Anticipated By Blagg

Claim 4 adds the limitations that the adjustment of the expenditure limit for any subordinate card can be accomplished in real time. The Examiner cites Paragraph [0136]. However, paragraph [0136] discusses a group credit line which is shared among cards which are members of the group. The cited paragraph does not discuss the authorization of modifications to credit lines for individual card accounts.

5. Claim 5 Is Not Anticipated By Blagg

Claim 5 contains a limitation that authorizations for modifications of the credit line are facilitated by a website available over the Internet, which the Examiner states is disclosed in Blagg at paragraphs [0059]-[0062]. However, these paragraphs only discuss a general computer program and not how that computer program is applied to the

invention disclosed in the cited reference. In addition, no mention is made of either a website or the Internet in the cited paragraphs.

6. Claims 7 and 8 Are Not Anticipated By Blagg

With respect to Claims 7 and 8, which state that the system of Claim 2 further comprises a software application running on a computer system and, in Claim 8, where the software application establishes communications with outside entities, the Examiner cites Blagg at paragraphs [0058] and [0059]. However, these paragraphs in Blagg only discuss how a method or process is generally embodied in a sequence of computer steps. Nothing in these paragraphs apply a software application to the processing of credit cards in the manner described in Claim 2, nor does it mention that the software application executing this method may establish communications with outside entities.

7. Claim 9 Is Not Anticipated By Blagg

With respect to Claim 9, which adds the limitation that communication with outside entities are encrypted prior to sending and decrypted after receiving to ensure data integrity, the Examiner cites Blagg, Figure 7B, reference numbers 754-760 regarding authorization and approval. However, this portion of Figure 7B pertains to whether individual requests for transactions for purchase are to be authorized or not authorized. No reference to encrypting and decrypting for purposes of securing communications with outside entities is mentioned in Figure 7B or in the accompanying text.

8. Claim 11 Is Not Anticipated By Blagg

With respect to Claim 11, which adds the limitation that the software application establishes communication with the bank which maintains the claimed bank account to which the master purchasing cards are linked, the Examiner states that this is disclosed in

Blagg at paragraphs [0062]-[0063]. However, these paragraphs discuss only that banks or other financial institutions are typically the issuers of the various credit card products, which is well known in the art. These paragraphs do not disclose that the software application which is part of the claimed invention establish communications with the bank at which the bank account is being maintained.

9. Claim 12 Is Not Anticipated By Blagg

Claim 12 adds the limitation that the software application be able to initiate a transaction to move funds between a bank account and the purchasing card accounts to cover expenditures made using the purchasing card accounts, the Examiner states that this is disclosed in Blagg at paragraphs [0016], [0035], [0104] and [0126]. First, as previously stated, the cited reference does not disclose having purchasing cards linked to a master bank account from which funds can be transferred to cover purchases. In addition, paragraph [0016] discusses recordkeeping with respect to purchases made using cards which are members of the group as well as how spending limits for each individual card is maintained; paragraph [0035] discloses a group credit line and the transfer of *balances* between accounts, not the transfer of *funds* between accounts to cover purchases already made with each individual account; paragraphs [0104] and [0126] disclose things which are not claimed in any of the claims of this application, as discussed previously. Paragraph [0104] discloses combining accounts and paragraph [0126] discloses changing the primary owner of a group.

10. Claim 13 Is Not Anticipated By Blagg

Claim 13 adds the limitation that the software application be able to establish communications with the credit card processor, which the Examiner states is disclosed in

Blagg at paragraph [0058]. However, paragraph [0058] only discusses a computer program in general and not this element of this claim.

11. Claim 14 Is Not Anticipated By Blagg

Claim 14 adds the limitation that the software application be able to instruct the credit card processor to modify an expenditure limit for any of the purchasing cards. The Examiner states that this is disclosed in Blagg at paragraphs [0062], [0121], [0136], [0153] and [0181]. Paragraph [0062] discusses a typical prior art processing of a credit card transaction; paragraph [0121] discloses modifying the relationship between the dependent count and the group to which it belongs; paragraph [0136] discloses how transactions are authorized for purchases made by credit cards within the group; paragraph [0153] discusses the application of payments received from users to their own account or to other cards which are members of the group; and paragraph [0181] discloses redeeming reward points as a member of the group. None of these paragraphs disclose the software application instructing a credit card processor to modify an expenditure limit for any of the purchasing cards.

12. Claim 15 Is Not Anticipated By Blagg

Claim 15 includes the limitation that the credit card processor and the software application exchange data, wherein the software application receives data advising of the purchases made by the purchasing cards. The Examiner states that this is disclosed in Blagg at paragraphs [0129]-[0131]. However, these paragraphs discuss how dependent accounts are added into the group and not how data is exchanged between the software application and a credit card processor. In fact, a credit card processor is not even mentioned in these paragraphs, nor is data regarding purchases made by dependent cards.

At least for the reasons discussed above, Applicants respectfully submit that all of the limitations disclosed in Claims 1-15 are not disclosed by the cited reference.

D. Claims 16-23 And 29 Are Not Anticipated By Blagg

Claim 16 is an independent claim. Claims 16-23 and 29 depend directly or indirectly from claim 16. Currently amended claim 16 requires a software application running on a computer system that is connected to the Internet, one or more master purchasing card accounts linked to a bank account and a plurality of subordinate purchasing card accounts, that are each logically linked to one of the master purchasing card accounts and to other subordinate purchasing card accounts linked, directly or indirectly, to one of the master purchasing card accounts. The software application controls the linking of the master purchasing card accounts and the subordinate purchasing card accounts and maintains a maximum transfer amount that can be transferred from the bank account or a parent account to any of the subordinate purchasing card accounts linked, directly or indirectly, to that account. A parent account refers to a master account that is linked to a subordinate account or a subordinate account that is linked to another subordinate account, such as for example, a sub-subordinate account or other subordinate account subordinate to that subordinate account.

1. Claim 16 Is Not Anticipated By Blagg

Blagg does not contain a disclosure of numerous limitations of currently amended claim 16. The limitations Blagg does not disclose are discussed below.

a. one or more master purchasing card accounts linked to a bank account

The Examiner states that this element is disclosed in Blagg at paragraphs [0055]-[0056], [0069] and [0072] (regarding linking accounts) and in Blagg at paragraph [0062]

(indicating that the issuer is typically a financial institution or bank). These paragraphs however, and in particular [0055]-[0056], [0069] and [0072], teach the grouping of cards together into groups by virtue of the creation of a “group” entity having the cards as members. The “group” entity is not a bank account, it is merely a data record that contains a listing of the members of the group (*See* Blagg, paragraph [0072]). Blagg does not disclose the linking of master purchasing card accounts to a specific bank account. In Blagg, there is no master bank account to which all of the master purchasing accounts are linked. Although each individual card in both Blagg and the present invention has their own accounts, there is no mention of the cards in Blagg being linked to a bank account different from the account present for each individual card. Instead, the cards in Blagg are formed together into a group of cards.

With respect to the issuer typically being a financial institution or bank as indicated in Blagg, paragraph [0062], the Applicants respectfully submit that it is not relevant because the issuer of each individual card being a financial institution or bank is not part of the Applicants' claim. It is common knowledge that issuers of credit cards are typically financial institutions or banks. However, no financial institution or bank currently allows the linking of an individual credit card account to a bank account. For these reasons, the Applicants respectfully submit that this element of Claim 1 and its dependent claims has not been met.

- b. *a plurality of subordinate purchasing card accounts, each being logically linked to one of said master purchasing card accounts or to other subordinate purchasing card accounts linked, directly or indirectly, to one of said master purchasing card accounts*

The Examiner states that this is disclosed in Blagg at paragraphs [0071]-[0075] and [0090]-[0094]. However, the Applicants respectfully submit that these paragraphs do not disclose linking accounts to each other but instead disclose linking accounts into a group. The grouping of accounts in Blagg is accomplished by linking a financial record that corresponds to each account to group master data record for the group. Therefore, cards are not linked to individual other cards or to a bank account, but are instead linked together in a group by virtue of the tying of their financial record to a group master data record (*See Blagg, paragraph [0072], lines 1-3 & Figure 4B*). Thus, the topography of the Blagg invention is different than that of the present application.

The Blagg topography is shown graphically in Figure 4B of Blagg, in which the Dependent Financial Records 404, 406, 408, 410, 412, 414 and 416 are linked to a "Group Master Data" 400 (not an account). Blagg does teach a Key Financial Record 402, which is the account that is liable for the group (*See Blagg, Paragraph [0079]*). Note, however, that Key Financial Record 402 is not directly linked to any of the Dependent Financial Records, nor are any of the Dependent Financial Records linked to any other Dependent Financial Records, as is claimed in the present application. Therefore, there is no parent/child relationship between the accounts.

The present invention, on the other hand, requires the linking of a card account to other accounts, which may be master accounts (i.e., account which are linked directly to the master bank account) or which may be other accounts which are subordinate to a

master account. This is not disclosed by Blagg, and for this reason, the Applicants respectfully submit that this element is also not taught by the cited reference.

- c. *wherein said software application controls said linking of said purchasing card accounts and maintains a maximum transfer amount that can be transferred from said bank account or a parent account to each of said purchasing card accounts subordinate thereto*

The Examiner states that this element is disclosed in Blagg at paragraphs [0075]-[0078], [0104] and [0126]. Paragraphs [0075]-[0078] discuss liability for purchases made by various cardholders in the group (i.e., one cardholder can be individually or jointly liable for purchases made on another card). Paragraphs [0075]-[0078] do not disclose the transferring of funds between cards or between a bank account and cards which are linked to that bank account. Further, paragraph [0104] discusses combining accounts, which the Applicants respectfully submit is not relevant because that feature is not part of the claim. In paragraph [0126], the cited reference discusses changing the primary owner of a group which also has no relevance here because the claim does not contain an element specifying changing the owner of the group. As a result, The Applicants respectfully submit that the transferring of funds between cards is not disclosed by the cited portions of Blagg. Moreover, the maintenance of a maximum transfer amount between different card accounts is not disclosed.

2. Claims 17-23 Are Not Anticipated By Blagg

With respect to Claims 17-23, which are dependent either directly or indirectly upon Claim 16, contain all of the limitations of Claim 16 and therefore the remarks with respect to Claim 16 apply to Claims 17-23 as well.

3. Claim 29 Is Not Anticipated By Blagg

With respect to Claim 29, which contains all of the elements of Claim 16, and, in addition, includes the element that the purchasing cards may create and break links to or from subordinate purchasing cards, the Examiner seems to argue that this element is disclosed in Blagg at paragraphs [0080] and [0085]. However, paragraph [0080] merely discusses that a record is maintained in a group member file even if an account is de-linked from the group. Paragraph [0080] does not specify how cards become linked or de-linked from the group and in particular does not state that the purchasing cardholders may create and break links to or from subordinate purchasing accounts. Likewise, paragraph [0085] discloses how a payment made to the group is to be applied across its various card members, and has no relevance with respect to the linking and de-linking of cards.

At least for the reasons discussion above, Applicants respectfully submit that all of the elements of Claims 16-23 are not disclosed by Blagg.

E. Claims 25-27 and 30 Are Not Anticipated By Blagg

Claim 25 is an independent claim. Claims 26-27 and 30 depend directly or indirectly from claim 25. Currently amended claim 25 requires a method for the payment of petty cash disbursements to include the steps of establishing an account at a bank, linking one or more master purchasing card accounts to the bank account, and linking one or more subordinate purchasing card accounts to one of the master purchasing card accounts or to other subordinate purchasing card accounts linked, directly or indirectly, to one of the master purchasing card accounts.

1. **Claim 25 Is Not Anticipated By Blagg**

Blagg does not contain a disclosure of numerous limitations of currently amended claim 25. The limitations Blagg does not disclose are discussed below:

- a. *linking one or more master purchasing card accounts linked to said bank account*

The Examiner states that this element is disclosed in Blagg at paragraphs [0055]-[0056], [0069] and [0072] (regarding linking accounts) and in Blagg at paragraph [0062] (indicating that the issuer is typically a financial institution or bank). These paragraphs however, and in particular [0055]-[0056], [0069] and [0072], teach the grouping of cards together into groups by virtue of the creation of a “group” entity having the cards as members. The “group” entity is not a bank account, it is merely a data record that contains a listing of the members of the group (*See Blagg, paragraph [0072]*). Blagg does not disclose the linking of master purchasing card accounts to a specific bank account. In Blagg, there is no master bank account to which all of the master purchasing accounts are linked. Although each individual card in both Blagg and the present invention has their own accounts, there is no mention of the cards in Blagg being linked to a bank account

different from the account present for each individual card. Instead, the cards in Blagg are formed together into a group of cards.

With respect to the issuer typically being a financial institution or bank as indicated in Blagg, paragraph [0062], the Applicants respectfully submit that it is not relevant because the issuer of each individual card being a financial institution or bank is not part of the Applicants' claim. It is common knowledge that issuers of credit cards are typically financial institutions or banks. However, no financial institution or bank currently allows the linking of an individual credit card account to a bank account. For these reasons, the Applicants respectfully submit that this element of Claim 1 and its dependent claims has not been met.

- b. linking one or more subordinate purchasing card accounts to one of said master purchasing card accounts or to other subordinate purchasing card accounts linked, directly or indirectly, to one of said master purchasing card accounts*

The Examiner appears to argue that this element is disclosed in Blagg at paragraphs [0071]-[0075] and [0090]-[0094]. However, the Applicants respectfully submit that these paragraphs do not disclose linking accounts to each other but instead disclose linking accounts into a group. The grouping of accounts in Blagg is accomplished by linking a financial record that corresponds to each account to group master data record for the group. Therefore, cards are not linked to individual other cards or to a bank account, but are instead linked together in a group by virtue of the tying of their financial record to a group master data record (*See Blagg, paragraph [0072], lines 1-3 & Figure 4B*). Thus, the topography of the Blagg invention is different that that of the present application.

The Bragg topography is shown graphically in Figure 4B of Bragg, in which the Dependent Financial Records 404, 406, 408, 410, 412, 414 and 416 are linked to a “Group Master Data” 400 (not an account). Bragg does teach a Key Financial Record 402, which is the account that is liable for the group (*See* Bragg, Paragraph [0079]). Note, however, that Key Financial Record 402 is not directly linked to any of the Dependent Financial Records, nor are any of the Dependent Financial Records linked to any other Dependent Financial Records, as is claimed in the present application. Therefore, there is no parent/child relationship between the accounts.

The present invention, on the other hand, requires the linking of a card account to other accounts, which may be master accounts (i.e., account which are linked directly to the master bank account) or which may be other accounts which are subordinate to a master account. Bragg does not disclose the linking of any subordinate account to other subordinate accounts. Bragg merely discloses the grouping of various dependent accounts to one key account. (*See e.g.*, Bragg, Paragraph 144). Bragg does not disclose a subordinate account that is linked to another subordinate account so that funds are transferable from one subordinate card account to another subordinate card account. Bragg discloses a key account that is configured to pay a statement of a dependent card grouped with the key account and a dependent account that is configured to pay the statement of its account. (*See e.g.* Bragg, Paragraphs 144-154). No subordinate account linked to another subordinate account for transferring funds between the two linked subordinate accounts is disclosed by Bragg.

Applicants respectfully submit that this element is also not taught by the cited reference.

2. Claims 26-27 Are Not Anticipated By Blagg

With respect to Claims 26-27, which are dependent either directly or indirectly upon Claim 25, contain all of the limitations of Claim 25 and therefore the remarks with respect to Claim 25 apply to Claims 26-27 as well.

3. Claim 30 Is Not Anticipated By Blagg

With respect to Claim 30, which contains all of the elements of Claim 25, and, in addition, includes the element that the purchasing cards may create and break links to or from subordinate purchasing cards, the Examiner seems to argue that this element is disclosed in Blagg at paragraphs [0080] and [0085]. However, paragraph [0080] merely discusses that a record is maintained in a group member file even if an account is de-linked from the group. Paragraph [0080] does not specify how cards become linked or de-linked from the group and in particular does not state that the purchasing cardholders may create and break links to or from subordinate purchasing accounts. Likewise, paragraph [0085] discloses how a payment made to the group is to be applied across its various card members, and has no relevance with respect to the linking and de-linking of cards.

At least for the reasons discussion above, Applicants respectfully submit that all of the elements of Claims 25-27 and 30 are not disclosed by Blagg.

III. REJECTIONS OF CLAIMS 6, 24 AND 28

The Examiner has rejected Claims 6, 24 and 28 under 35 U.S.C. § 103(a) as being unpatentable over Blagg in view of U.S. Patent No. 6,581,035 (Madan et al., hereinafter "Madan"). The Examiner states that all elements of the claim are disclosed by Blagg

except the use of voice recognition software to accomplish the transactions, which he states are disclosed in Madan in the Abstract, and in Figure 2 and the associated text.

As discussed above, Blagg does not teach each and every limitation of claims 1-5, 7-9, 11-23, 25-27 and 29-30. Moreover, Madan does not teach or suggest each and every limitation of the claims that claim 6, 24 and 28 depend from. Similarly, Madan in combination with Blagg do not disclose each and every limitation of claims 6, 24 and 28. Consequently, claims 6, 24 and 28 are not rendered obvious by Madan in view of Blagg.

Furthermore, these claims must be read in the context of the present application to read that the voice recognition facility facilitates requests for modifications of a maximum transfer amount for any subordinate account. The combination of the two references does not suggest or disclose utilizing a voice recognition facility to facilitate modifying a maximum transfer amount between credit cards which are linked together.

For at least the above reasons, the rejection of claims 6, 24 and 28 should be withdrawn.

IV. CONCLUSION

For at least the above reasons, the Applicants respectfully submit that all pending claims are in a condition for allowance. Applicants request reconsideration of all currently pending claims, the withdrawal of the rejections under § 102(e) and 103(a) and the issuance of a Notice of Allowance of all currently pending claims at the earliest possible time.

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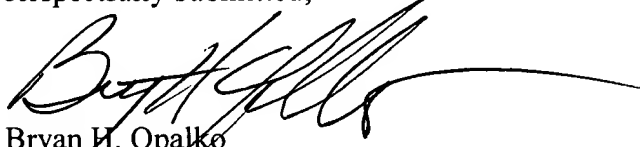
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The Commissioner is hereby authorized to charge any fees associated with this communication to Deposit Account No. 02-4800.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bryan H. Opalko', with a long horizontal flourish extending to the right.

Dated: February 19, 2008

Bryan H. Opalko
BUCHANAN INGERSOLL & ROONEY PC
Reg. No. 40,751
One Oxford Centre
301 Grant Street, 20th Floor
Pittsburgh, Pennsylvania 15219
ph: (412) 562-1893
fx: (412) 562-1041
e-mail: bryan.opalko@bipc.com
Attorney for Applicants